

US DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS
FILED

JAN 15 2020

DOUGLAS F. YOUNG, Clerk
By *Douglas F. Young*

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS
HOT SPRINGS DIVISION

UNITED STATES OF AMERICA)	
)	Case No. 6:19CR60042-001
)	
v.)	
)	18 U.S.C. § 2262(a)(1)
)	18 U.S.C. § 2262(b)(3)
)	18 U.S.C. § 2252A(a)(1)
)	18 U.S.C. § 2252A(b)(1)
ALEXANDER MARTIN CURRY-FISHTORN)	18 U.S.C. § 2256(8)

REDACTED SUPERSEDING INDICTMENT

The Grand Jury Charges:

COUNT ONE

[Interstate Violation of a Protection Order]

Between on or about August 16, 2019 and on or about August 18, 2019, in the Western District of Arkansas, Hot Springs Division and elsewhere, the defendant, **ALEXANDER MARTIN CURRY-FISHTORN**, traveled in interstate commerce, from Indiana to Arkansas, with the intent to engage in conduct that violated the portion of a protection order issued out of the Lake County Superior Court, Civil Division 7, in Lake County, Indiana on May 20, 2019, that prohibited contact and communication with JANE DOE, and did subsequently engage in such conduct and used a dangerous weapon during the offense.

All in violation of Title 18, United States Code, Sections 2262(a)(1) and (b)(3).

COUNT TWO

[Transporting Child Pornography]

Between on or about August 16, 2019 and on or about August 18, 2019, in the Western District of Arkansas, Hot Springs Division and elsewhere, the defendant, **ALEXANDER**

MARTIN CURRY-FISHTORN, did knowingly transport in and affecting interstate by any means, including by computer, any child pornography as defined in Title 18, United States Code, Section 2256(8), to wit: The Defendant transported a cellular phone containing child pornography via vehicle across state lines from Indiana to Arkansas.

All in violation of Title 18 United States Code, Sections 2252A(a)(1) and (b)(1).

FORFEITURE ALLEGATION

The Grand Jury re-alleges and incorporates by reference herein Count Two of this Indictment.

Upon conviction of Count Two of this Indictment, the Defendant shall forfeit to the United States pursuant to 18 United States Code, Section 2253 the Defendant's interest in:

1) any visual depiction described in 18 United States Code, Sections 2251, 2251A, or 2252, 2252A, 2252B, or 2260, or any book, magazine, periodical, film, videotape, or other matter, which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of the offenses in the Indictment;

2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses in the Indictment; and

3) any property, real or personal, **including any and all computer equipment OR cellular device**, used or intended to be used to commit or to promote the commission of the offenses in the Indictment, or any property traceable to such property, including, but not limited to computer equipment used in the commission of the offenses in the Indictment.

If any of the property subject to forfeiture, as a result of any act or omission of the Defendant:

a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

It is the intent of the United States, pursuant to Title 18, United States Code, Section 2253(b), incorporating by reference Title 21, United States Code, Section 853 to seek forfeiture of any other property of said Defendant up to the value of the above forfeitable property.

A True Bill.

DUANE (DAK) KEES
UNITED STATES ATTORNEY

/s/Grand Jury Foreperson
Grand Jury Foreperson

By:


Carly Marshall
Assistant U. S. Attorney
Arkansas Bar No. 2012173
414 Parker Avenue
Fort Smith, AR 72901
Telephone: 479-783-5125
E-mail carly.marshall@usdoj.gov